

REMARKS

Claims 1, 5, 41, 42 and 47 are amended. Claims 43-46 and 48-53 are cancelled without prejudice and without agreeing to the propriety of the Examiner's rejection pertaining to such claims. Claim 54 is added. Claims 1-11, 41, 42, 47 and 54 are in the application for consideration.

Support for Applicant's added claim 54 can be found on page 11 of the specification as-filed.

The 35 U.S.C. §112, second paragraph, rejections of claims 41 and 42 are overcome by amendment to such claims.

Applicant's independent claims 1 and 5 stand rejected as being obvious over a combination of Applicant's admitted prior art in view of U.S. Patent No. 5,954,887 to Hatano. However, Applicant's independent claims 1 and 5 recite that the first feeding of TiCl_4 occurs with the substrate in the chamber, and that the recited second feeding also occurs on the substrate which was received within the chamber during the first feeding. Such is not encompassed by either of Applicant's admitted prior art or Hatano. Specifically, Applicant's admitted art in its Background section refers to cleaning processing which occurs while no substrate deposited upon is received within the chamber. Likewise, Hatano only discloses its cleaning process when no substrate which has been or will be deposited upon is received within the chamber. Accordingly, Applicant's independent claims 1 and 5 recite something which is not encompassed by either of the applied references, and accordingly the combination of such references does not

encompass all of the limitations of Applicant's independent claims 1 and 5. For at least this reason, the rejections thereof should be withdrawn, and action to that end is requested.

Further, it would be improper to assert modification of the teaching of Hatano where such modification would undermine the processing and intended purpose of the reference. Specifically, Hatano is depositing titanium onto its object to be processed and etching the very same material (elemental titanium) from internal chamber components. Accordingly, modifying Hatano in the context of Applicant's claim 1, which would require cleaning while the substrate is within the chamber, would result in etching of the very material which Hatano is depositing upon its substrate, and accordingly defeats the purpose thereof. For at least this additional reason, the Examiner's combination of references is improper and not encompassing of Applicant's independent claims 1 and 5. Accordingly, the rejection thereof should be so withdrawn, and action to that end is requested.

Applicant's independent claim 5 and dependent claim 47 recite that nothing other than TiCl_4 is fed to the chamber during the first period of time. Such is contrary to the teaching of Hatano where some carrier gas also accompanies its TiCl_4 during its alleged equivalent flow of TiCl_4 . Accordingly, Hatano recites the opposite of this additional feature in Applicant's independent claim 5 and dependent claim 47. Therefore, independent claim 5 and dependent claim 47 should be allowed for this additional reason alone.

Applicant's dependent claim 54 recites that the first feeding comprises plasma generation within the chamber, and that the plasma generation within the chamber is continued from the first feeding through the second feeding. Hatano teaches the exact opposite, and accordingly, dependent claim 54 should be allowed for this additional reason.

Applicant's remaining dependent claims should be allowed as depending from allowable base claims, and for their own recited features which are neither shown nor suggested in the cited art. Action to that end is requested.

This application is believed to be in immediate condition for allowance, and action to that end is requested.

Respectfully submitted,

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By: 

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